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Presentment Date: April 14, 2011  
Time: 12:00 p.m.

Objections Due: April 14, 2011  
Time: 11:00 a.m.

*Attorneys for Irving H. Picard, Esq., Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC  
And Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

**NOTICE OF PRESENTMENT OF TRUSTEE'S MOTION FOR AN ORDER  
APPROVING THE RETENTION OF OSBORNE & OSBORNE, P.A. AS  
SPECIAL COUNSEL NUNC PRO TUNC AS OF MARCH 8, 2011**

**PLEASE TAKE NOTICE** that upon the motion of Irving H. Picard, as trustee ("Trustee") to the substantively consolidated liquidation of the business of

Bernard L. Madoff Investment Securities LLC (“BLMIS”) and the estate of the Bernard L. Madoff, for entry of an order approving the retention of Osborne & Osborne, P.A. as special counsel to the Trustee, nunc pro tunc, as of March 8, 2011, the undersigned will present the attached motion (the “Motion”) and proposed order (the “Order”) to the Honorable Burton R. Lifland, United States Bankruptcy Judge, for signature and entry on **April 14, 2011 at 12 Noon.**

**PLEASE TAKE FURTHER NOTICE**, the objections, if any to the Motion (“Objections”), shall (i) be in writing, (ii) conform to the Federal Rules of Bankruptcy Procedure, Local Bankruptcy Rules and General Orders, (iii) specify the name of the objecting party and state with specificity the basis of the objection(s) and the specific grounds therefore, (iv) filed in accordance with the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York, with a proof of service, and a courtesy copy delivered to the Chambers of the Honorable Burton R. Lifland, One Bowling Green, New York, New York 10004, (v) service upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: Marc E. Hirschfield, (b) Young Conaway Stargatt & Taylor, LLP, special counsel to the Trustee, Rockefeller Center, 1270 Avenue of the Americas, Suite 2210, New York, New York 10020 and The Brandywine Building, 1000 West Street, 17th Floor, Wilmington, Delaware 19801, Attn: Matthew B. Lunn, and (c) the Securities Investor Protection Corporation, 805 fifteenth Street, NW, Suite 800, Washington, DC 20005, Attn: Kevin H. Bell, so as to be received no later than **11:00 a.m. on April 14, 2011.**

**PLEASE TAKE FURTHER NOTICE**, that in the event any objections are timely served and filed, a hearing may be held before the Honorable Burton R. Lifland, United States Bankruptcy Judge, at a date and time to be scheduled by the Court, upon such additional notice as the Court may direct. The moving and objecting parties are required to attend the hearing and failure to attend in person or by counsel may result in relief being granted or denied upon default.

**PLEASE TAKE FURTHER NOTICE**, that, unless Objections are timely served and filed, the proposed Order may be signed without a hearing.

Date: April 6, 2011  
New York, New York

Of Counsel:

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By: /s/ Matthew B. Lunn  
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Liquidation of Bernard L. Madoff  
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